

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
CHRISTMAS TREE SHOPS, LLC, <i>et al.</i> , ¹	Case No. 23-10576 (TMH)
Debtors.	(Jointly Administered)
AINSLIE H. VOREL, on behalf of herself and all others similarly situated,	
Plaintiff,	Adv. Pro. No. 23-50446 (TMH)
v.	
CHRISTMAS TREE SHOPS, LLC,	
Defendant.	

**STIPULATION FOR EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO THE COMPLAINT**

Defendant Christmas Tree Shops, LLC (“Defendant”) and Plaintiff Ainslie H. Vorel (“Plaintiff” and together with Defendant, the “Parties”), through their respective counsel, enter into this *Stipulation for Extension of Time for Defendant to Respond to the Complaint* (the “Stipulation”) and hereby stipulate and agree as follows:

1. Pursuant to Del. Bankr. L.R. 7012-2, the Parties agree that the time within which Defendant may answer, move, or otherwise respond to the *Class Action Adversary Complaint for Violation of the Worker Adjustment and Retraining Notification Act, 29 U.S.C. §§ 2101, et seq., and Violation of New Jersey WARN Act, N.J.S.A. § 34:21-1 et seq.* [Adv. D.I. 1] (the “Complaint”)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are as follows: Christmas Tree Shops, LLC (1207), Handil, LLC (1150), Handil Holdings, LLC (2891), Salkovitz Family Trust 2, LLC (8773), and Nantucket Distributing Co., LLC (1640). The notice address for the Debtors is 64 Leona Drive, Middleboro, Massachusetts 02346.

is hereby extended for a period of fifteen (15) days, to September 11, 2023.

2. The extension is without prejudice to either Party and entry into this Stipulation shall be without prejudice to the abilities of the Parties to seek or oppose further extensions of the deadline to respond to the Complaint.

Dated: August 7, 2023
Wilmington, Delaware

/s/ Christopher Viceconte

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